

## ATTACHMENT 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

---

CATHERINE GAUJACQ,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 1:05CV0969 (HHK)
	)	
ELECTRICITE DE FRANCE	)	
INTERNATIONAL NORTH AMERICA,	)	
INC. and	)	
	)	
ELECTRICITE DE FRANCE, S.A. and	)	
	)	
CHRISTIAN NADAL,	)	
	)	
Defendants	)	
	)	

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**NOTICE OF APPEAL**

Notice is hereby given that Plaintiff, Catherine Gaujacq, hereby appeals to the United States Court of Appeals for the District of Columbia Circuit from the Order, dated August 21, 2008, granting summary judgment in favor of Defendants Electricite De France International North America, Inc , Electricite De France, S A , and Christian Nadal, and the August 21, 2008 final order dismissing this case.

Plaintiff further gives Notice that she is appealing to the United States Court of Appeals for the District of Columbia Circuit the absence of any ruling on her Motion for Leave to Supplement Plaintiff's Opposition to Defendants' Motions for Summary Judgment filed on March 5, 2008 and her Reply in Support of Motion for Leave to Supplement Plaintiff's Opposition to Defendants' Motions for Summary Judgment filed on March 27, 2008.

Plaintiff further gives Notice that she is appealing to the United States Court of Appeals for the District of Columbia Circuit the absence of any ruling on her Motion to Compel and for Sanctions filed on April 23, 2008 and her Reply to Defendants' Opposition to Plaintiff's Motion to Compel and for Sanctions filed on May 19, 2008.

September 10, 2008

Respectfully submitted,

/s/ ELAINE CHARLSON BREDEHOFT

---

Elaine Charlson Bredehoff  
D.C. Bar No. 441425  
Carla D. Brown  
D.C. Bar No. 474097  
Kathleen Z. Quill  
D.C. Bar No. 489079  
CHARLSON BREDEHOFT & COHEN, P.C.  
11260 Roger Bacon Drive, Suite 201  
Reston, Virginia 20190  
(703) 318-6800  
(703) 318-6808 (facsimile)

*Counsel for Plaintiff,  
Catherine Gaujacq*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10<sup>th</sup> day of September 2008, a copy of the foregoing Notice of Appeal was filed electronically via ECF and mailed via first class mail, postage prepaid, to:

Laura B. Hoguet, Esq.  
Dorothea W. Regal, Esq.  
HOGUEI NEWMAN & REGAL, LLP  
10 East 40<sup>th</sup> Street  
New York, NY 20016

*Counsel for Defendants EDF, SA  
and EDFINA*

Morgan D. Hodgson, Esq.  
David A. Clark, Esq.  
STEPTOE & JOHNSON LLP  
1330 Connecticut Avenue, N.W.  
Washington, D.C. 20036

*Counsel for Defendant Christian Nadal*

/s/ ELAINE CHARLSON BREDEHOFT

---

Elaine Charlson Bredehoft  
D.C. Bar No. 441425  
Carla D. Brown  
D.C. Bar No. 474097  
Kathleen Z. Quill  
D.C. Bar No. 489079  
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Reston, Virginia 20190  
(703) 318-6800  
(703) 318-6808 (facsimile)

*Counsel for Plaintiff,  
Catherine Gaujacq*

## ATTACHMENT 2

**PLATT & DAWSON, INC.**  
**Attorney Rate Schedule**  
**January 25, 2006**

Regular Attendance Rates			
10:00 am -1:00 pm	\$150.00	1:00 pm - 5:00 pm	\$200.00
10:00 am -2:00 pm	\$200.00	2:00 pm - 5:00 pm	\$150.00
10:00 am - 5:00 pm	\$300.00	3 hours (before 5:00 pm)	\$150.00

Before 5 p.m.: \$25 per half hour/\$50 per hour (after 3 hours)  
After 5 p.m.: \$38 per half hour/\$75 per hour  
After midnight: \$50 per half hour/\$100 per hour  
Minimum Attendance: \$150.00 (up to 3 hours)  
En route cancellation: \$100.00  
Court: Attendance plus pages  
When a deposition not transcribed is ordered within 30 days, the attendance fee is applied to the cost

**SATURDAY/ SUNDAY/ HOLIDAY ATTENDANCE RATES**

(Holidays: New Years Day, President's Day, Memorial Day, July 4th, Labor Day, Thanksgiving Day and Christmas)

Court: Regular attendance rate x 1.5

Depositions: Regular attendance plus pages

Depositions not transcribed: Regular attendance rate x 1.5

**Transcript Page Rates**

	Original + Copy	Copy*
Regular	3.80	2.00
Semi-expedite (6-9 working days)	4.00	2.20
5-day or Panel or Committee (under 10)	4.50	2.35
4-day	5.00	2.60
3-day/Public Hearing	5.50	2.85
2-day	6.00	3.10
Daily	6.50	3.35
Same day	8.75	4.40
Medical (difficult) or video	+0.30	+0.15
Draft Deposition	1.00	1.00
Draft court- same day	1.25	1.25
Draft court- not same day	1.00	1.00
Draft with difficult medical	+.25	+.25

\*Second copy rate to same attorney: .25 per page

Uncontested minimum (5 day delivery): \$150.00

Daily transcript minimum: \$175.00

Waiting time over one-half hour: \$25 per half hour

Deposition with interpreter: Pages plus one-half of the hourly rate

Transcribing tapes: Pages plus hourly rate

**Miscellaneous**

Receipt/ mailing of subpoenaed records: \$30.00 plus postage

ASCII disk: \$10.00

Exhibit copies: .20 per page regular/.25 per page legal

Video rates upon request.

*2nd Copy  
rate to  
rptr should  
be .25 on  
all rptr sheet*

## ATTACHMENT 3

**Kathy Baker**

**From:** Karina Gukasian-Hunt [kgukasian@trustfortelanguages.com]  
**Sent:** Thursday, September 18, 2008 12:04 PM  
**To:** Kathy Baker  
**Subject:** RE: Invoices  
**Attachments:** TFL price list-2008.doc  
**TimeMattersID:** MD9229B36B21A615  
**TM Contact:** Catherine Gaujacq  
**TM Matter No:** 690  
**TM Matter Reference:** Gaujacq, Catherine

Hi Kathy,

The regular translation prices for these documents would have been as follows:

nvoice 250682	\$120
nvoice 251211	\$120
nvoice 251299	\$85
nvoice 255236	\$35

am also attaching our price list.

Please let me know if you have any questions.

Thank you,

*Karina Gukasian-Hunt  
 VP, Special Projects  
 Trustforte Language Services  
 271 Madison Avenue, 3rd Floor  
 New York, NY 10016  
 Tel: 212-481-4980  
 Fax: 212-683-4801  
 kgukasian@trustfortelanguages.com  
 www.trustfortelanguages.com*

**From:** Kathy Baker [mailto:[kbaker@cbc-law.com](mailto:kbaker@cbc-law.com)]  
**Sent:** Thursday, September 18, 2008 11:53 AM  
**To:** [info@trustfortelanguages.com](mailto:info@trustfortelanguages.com)  
**Subject:** Invoices

Good morning, Karina,

Per our telephone conversation a few minutes ago, I am attaching copies of four invoices which date back to October 2006 and December 2006. I would appreciate your advising me for each invoice what the charge(s) would be regular (vs rush or expedited or next day) service with respect to your rates back in 2006, as soon as possible.

Thank you very much for your assistance. Please feel free to contact me should you have any questions.

Kathy Baker

Kathryn McBride Baker  
Paralegal  
Charlson Bredehoft & Cohen, P.C.  
1260 Roger Bacon Drive, #201  
Reston, Virginia 20190  
(703) 318-6800

## ATTACHMENT 4

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

---

CATHERINE GAUJACQ,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 1:05CV0969 (JGP)
	)	
ELECTRICITÉ DE FRANCE, S.A.,	)	
ELECTRICITÉ DE FRANCE	)	
INTERNATIONAL NORTH AMERICA,	)	
INC., et al.,	)	
	)	
Defendants.	)	
	)	

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**NOTICE OF BULKY EXHIBITS**

Pursuant to the procedures for filing documents electronically, exhibits 1 through 96, which are the attachments to Defendants' Statement Pursuant to FRCP 56.1 and Local Rule 7(h), are in paper form only and are being maintained in the case file in the Clerk's Office. These documents will be available for public viewing and copying between the hours of 9:00 a.m. to 4:00 p.m., Monday through Friday.

**NANCY MAYER-WHITTINGTON**

Clerk

October 16, 2006

## ATTACHMENT 5

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

---

CATHERINE GAUJACQ,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 1:05CV0969 (JGP)
	)	
ELECTRICITÉ DE FRANCE, S.A.,	)	
ELECTRICITÉ DE FRANCE	)	
INTERNATIONAL NORTH AMERICA,	)	
INC., et al.,	)	
Defendants.	)	
	)	

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**NOTICE REGARDING FILING OF SEALED MATERIAL**

Notice is given that a portion of Exhibit F (an attachment to the Declaration of Patrick De Botherel), and Exhibits 27, 30 and 60, (attachments to Defendants' Statement Pursuant to FRCP 56.1 and Local Rule 7(h)), together with their translations have been filed as Sealed Attachments in paper format with the Court. These documents are not available for public viewing.

**NANCY MAYER-WHITTINGTON**

Clerk

October 16, 2006

## ATTACHMENT 6

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In the U.S. District Court  
For the District of Columbia

-----x  
Catherine Gaujacq :  
: NO. 1:05CV0969  
v. :  
:  
Electricite de France :  
International, North :  
America, et al :  
-----x

March 16, 2006

DEPOSITION OF:

Catherine Gaujacq,  
a witness, called by counsel pursuant to notice,  
commencing at 9:30 a.m., which was taken at 11260  
Roger Bacon Drive, Reston, VA

Page 2

## 1                   Appearances

2       Elaine C. Bredehoft, Esq.

3       Charlson, Bredehoft and Cohen

4       11260 Roger Bacon Drive

5       Reston, VA 20190

6       for the Plaintiff

7

8       Laura B. Hogeut, Esq.

9       Steptoe and Johnson

10      1330 Connecticut Ave., NW

11      Washington, DC 20036-1795

12      for the Defendant

13

14

15

16

17

18

19

20

21

In the U.S. District Court  
For the District of Columbia

-----x  
Catherine Gaujacq :  
: NO. 1:05CV0969  
v. :  
: Electricite de France :  
International, North :  
America, et al :  
-----x

March 17, 2006

DEPOSITION OF:

Catherine Gaujacq (Cont'd)

a witness, called by counsel pursuant to notice,  
commencing at 8:41 a.m., which was taken at 11260  
Roger Bacon Drive, Reston, VA

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## 1 Appearances

<sup>2</sup> Elaine C. Bredehoft, Esq.

<sup>3</sup> Charlson, Bredehoft and Cohen

<sup>4</sup> 11260 Roger Bacon Drive

5 Reston, VA 20190

<sup>6</sup> for the Plaintiff

<sup>8</sup> Laura B. Hoguet, Esq.

9 Steptoe and Johnson

<sup>10</sup> 1330 Connecticut Ave., NW

<sup>11</sup> Washington, DC 20036-1795

<sup>12</sup> for the Defendant.

13

**COPY**  
IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

566

-----x  
:  
CATHERINE GAUJACQ, :  
:  
Plaintiff, :  
:  
vs. : 1:05CV0969 (JGP)  
:  
ELECTRICITE DE FRANCE :  
INTERNATIONAL NORTH AMERICA, INC , :  
et al , :  
:  
Defendants :  
:  
-----x

Washington, D.C.

Friday, June 2, 2006

Continuing deposition of CATHERINE GAUJACQ, called  
for examination by counsel for the defendants,  
pursuant to notice, at the office of Steptoe &  
Johnson, LLP, 1330 Connecticut Avenue, N.W.,  
Washington, D.C., before Laurel P. Platt, a Registered  
Diplomatic Reporter, and Fada S. Chaconas, a notary  
public in and for Washington, D.C., beginning at 8:37  
a.m., when were present on behalf of the respective  
parties:

1 FOR THE PLAINTIFF:  
 2 ELAINE CHARLSON BREDEHOFT, ESQ  
 3 Charlson, Bredhoff & Cohen P C  
 4 11260 Roger Bacon Drive  
 5 Suite 201  
 Reston, Virginia 20190  
 6 FOR THE DEFENDANT CHRISTIAN NADAL:  
 7 MORGAN D HODGSON, ESQ  
 8 DAVID A CLARK, ESQ,  
 Steptoe & Johnson, LLP  
 1330 Connecticut Avenue, N W  
 Washington, D C 20036  
 202-429-3000  
 9 FOR THE DEFENDANTS ELECTRICITE DE FRANCE, S A, AND  
 10 ELECIRICITE DE FRANCE INTERNATIONAL NORTH AMERICA:  
 11 DOROTHY W REGAL, ESQ  
 Roguet, Newman & Regal, LLP  
 12 10 East 40th Street  
 New York, New York 10016  
 13 212-689-8808

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1 PROCEEDINGS  
 2 Whereupon,  
 3 CATHERINE GAUJACQ,  
 4 plaintiff, was called for examination by counsel for  
 5 the defendants, and after having been first duly  
 6 sworn, was examined and testified as follows:  
 7 EXAMINATION BY COUNSEL FOR THE DEFENDANT  
 8 CHRISTIAN NADAL  
 9 BY MS HODGSON:  
 10 Q Good morning, Ms Gaujacq My name is Morgan  
 11 Hodgson. I am with Steptoe & Johnson. I represent  
 12 Defendant Christian Nadal, and I am going to be  
 13 examining you on behalf of all defendants, and then  
 14 Ms Regal will ask whatever additional questions she  
 15 may wish to ask you this morning, also on behalf of  
 16 all defendants. You understand that this a  
 17 continuation of your deposition.  
 18 A Yes  
 19 Q And you understand that you are under oath --  
 20 A I do  
 21 Q -- and what that means.  
 22 A Yes

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1 INDEX  
 2  
 3 EXAMINATION BY COUNSEL FOR  
 4 THE DEFENDANTS:  
 5 WITNESS MR NADAL, EDF, EDFINA,  
 6 Catherine Gaujacq 569 690 MS REGAL  
 7  
 8 EXHIBITS  
 9 CATHERINE GAUJACQ FOR IDENTIFICATION  
 10 No 89 (Catherine Gaujacq's resume) 576  
 11 No 90 (3/1/05 offer letter) 589  
 12 No 91 (Employee Pay Stub Image) 595  
 13 No 92 (Entergy benefits form) 609  
 14 No 93 (chronology of events) 630  
 15 No 94 (Simulation de pension) 661  
 16 No 95 (IRS 2004 Form 1040) 675  
 17 No 96 (IRS 2005 tax forms) 675  
 18 No 97 (4/15/06 check copy) 680  
 19 No 98 (copy of passport pages  
 20 Bites 2529 through 2532) 697  
 21 No 99 (passport copy) 717  
 22

1 Q I'd like to ask you some questions initially  
 2 about your departure from EDF. Okay?  
 3 A Okay.  
 4 Q Who is Jeff Wheelock?  
 5 A I mean --  
 6 Q Does that name ring a bell?  
 7 A Not really.  
 8 Q Did you ever speak to somebody who was the  
 9 human resources director at IMPO?  
 10 A Yes, I do  
 11 Q Does that refresh your recollection that you  
 12 might have spoken to a man named Jeff Wheelock?  
 13 A I mean, no Honestly, no I spent a few  
 14 hours with human resources people at IMPO, and you  
 15 tell me Jeff Wheelock was at IMPO or he's at IMPO  
 16 You say it I don't recall  
 17 Q When did you meet with human resources  
 18 representatives at IMPO?  
 19 A I had one interview about opportunities of  
 20 employment in the nuclear industry at IMPO at the end  
 21 of October of 2004  
 22 Q And that took place in Atlanta?